

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: Marianne Mehalshick : CHAPTER 13
Debtor : Bankruptcy Case No. 18-13758REF

ANSWER TO MOTION TO DISMISS

And now comes the Debtor, Marianne Mehalshick, by and through her undersigned counsel, and hereby responds to the Motion to Dismiss as follows:

- 1-2. Admitted.
3. The prior cases are of record and speak for themselves. By way of further answer hereto, the undersigned counsel was not counsel of record in those cases. The pending case was filed in good faith and Debtor intends to proceed forward.
4. Admitted; by way of further answer thereto, the Debtor has not received any payment coupons or book and was unsure where to forward her payments.
5. While it is admitted that the Debtor failed to appear, there was some confusion with respect to said Meeting of Creditors and the same was mis-dairied by counsel.
6. Denied. To the contrary, the Debtor, now with counsel, would like the opportunity to pursue her filing and complete the same. By way of further answer hereto, should the Debtor be unsuccessful with her efforts to save her home, this case may be converted to a Chapter 7.

WHEREFORE, Debtor prays that the Motion to Dismiss be denied, that she be given an opportunity to move forward on her case, and for such other relief as is just and equitable.

Respectfully Submitted,



Ronald V. Santora, Esquire ID # 35061
Bresset & Santora, LLC
1188 Wyoming Avenue
Forty-Fort, PA 18704
Phone (570) 287-3660
Fax (570) 287-3666